

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ADMIIN INC. d/b/a PARO INC.,)	
A Delaware Corporation,)	
)	
Plaintiff,)	Case No. 1:23-cv-04430
)	
v.)	Judge Franklin U. Valderrama
)	
LUKE KOHAN an individual,)	Magistrate Judge M. David Weisman
and FIRMKEY SOLUTIONS LLC,)	
)	
)	
Defendants.)	

AGREED MOTION FOR ENTRY OF CONFIDENTIALITY ORDER

Plaintiff Admiin Inc. d/b/a Paro Inc. (“Plaintiff”), and Defendants Luke Kohan and FirmKey Solutions LLC (collectively, “Defendants,” together with Plaintiff, the “Parties”), move the Court to enter an agreed confidentiality order pertaining to the production and dissemination of documents.

In support of this Agreed Motion, Plaintiff states as follows:

1. Federal Rule 26(c) authorizes the Court to enter a protective order regarding discovery for good cause shown. Fed. R. Civ. P. 26(c).
2. The Parties have conferred regarding certain issues pertaining to the production and dissemination of documents. The Parties agree that this case will involve the production of sensitive documents and information, including potentially sensitive business materials which each party keeps confidential to protect its competitive advantages and trade secrets.
3. As a result, the Parties have agreed to seek entry of an agreed confidentiality order modeled on the United States District Court for the Northern District of Illinois’ L.R. 26.2 Model Confidentiality Order (the “Agreed Confidentiality Order”). Pursuant to the Court’s Case Procedures, the proposed order has been provided to the Court directly for consideration.

4. The Parties have not added to the Agreed Confidentiality Order any categories of documents not expressly listed in the L.R. 26.2 Model Confidentiality Order. Good cause exists to enter the proposed Agreed Confidentiality Order because those categories of documents pertain to trade secrets or other categories of bona fide long-term confidentiality in which there is no legitimate public interest. *See Baxter Int'l, Inc. v. Abbott Labs.*, 297 F.3d 544, 545 (7th Cir. 2002).

5. The changes to the Northern District of Illinois' L.R. 26.2 Model Confidentiality Order include the addition of: (1) case specific information; (2) this Court's requirements regarding sealing of documents; and (3) other changes identified in the redline attached as **Exhibit 1** to this Motion.

WHEREFORE, Plaintiff Admiin Inc. d/b/a Paro Inc., with the agreement of Defendants Luke Kohan and FirmKey Solutions LLC respectfully, moves this Court for entry of the proposed Agreed Confidentiality Order, and for any other relief the Court deems proper.

Dated: August 22, 2023

Respectfully submitted,

ADMIIN INC. d/b/a PARO INC.

By: /s/ Chad W. Moeller
One of Its Attorneys

Chad W. Moeller (cmoeller@nge.com)
Sonya Rosenberg (srosenger@nge.com)
Collette A. Woghiren (cwoghiren@nge.com)
NEAL GERBER & EISENBERG LLP
2 N. LaSalle St., Suite 2200
Chicago, Illinois 60602
(312) 269-8000

CERTIFICATE OF SERVICE

Collette A. Woghiren, an attorney, certifies that on August 22, 2023, she caused a copy of foregoing *Agreed Motion for Entry of Confidentiality Order* to be filed via this Court's CM/ECF System, which shall send notification to all counsel of record by operation of the Court's electronic filing system.

/s/ Collette A. Woghiren